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ATTORNEYS FOR DEBTORS
AND DEBTORS IN POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re:)	Chapter 11 Cases
)	
AMERICAN WORKERS INSURANCE)	Case No. 19-44208-mxm11
SERVICES, INC.,)	
)	
ASSOCIATION HEALTH CARE)	Case No. 19-44209-elm11
MANAGEMENT, INC.)	
)	
)	Jointly Administered Under
Debtors.)	Case No. 19-44208-mxm11

**THIRD MODIFICATION TO THE AMENDED JOINT PLAN OF REORGANIZATION
FOR AMERICAN WORKERS INSURANCE SERVICES, INC. AND
ASSOCIATION HEALTH CARE MANAGEMENT, INC.**

COME NOW the Debtors, American Workers Insurance Services, Inc. and Association Health Care Management, Inc., and file this *Third Modification* (the "Third Modification") to the *Amended Joint Plan of Reorganization for American Workers Insurance Services, Inc. and Association Health Care Management, Inc.* (the "Plan") [Docket No. 609]. This Third Modification serves the purposes of documenting a settlement between the Debtors and Dr. Mahmoud "Mike" Rabie and seeking approval of that settlement as part of the Plan.

1. The following Section 6.16 is hereby added to the Plan:

6.16. Settlement with Dr. Mahmoud "Mike" Rabie. Dr. Mahmoud "Mike" Rabie ("Rabie") filed proofs of claim against each of the Debtors in the amount of

\$3,500,000.00 (the “Rabie Claims”). The Debtors have objected to the Rabie Claims, and Rabie has responded to the Debtors’ objections. The matter has not yet been set for hearing, nor has it been decided by the Court. The Debtors believe they have claims against Rabie for recovery of prepetition transfers in the amount of \$684,490.20. The Debtors have not yet filed a complaint but have shared a draft complaint with Rabie. The Debtors and Rabie have agreed to resolve these disputes as follows:

- a) Rabie agrees to withdrawal of the Rabie Claims with prejudice to refiling and agrees that the Rabie Claims shall not be payable by the Debtors;
- b) Rabie agrees to waive and release any and all claims against the Debtors;
- c) The Debtors agree to waive and release, and the Debtors expressly do not retain, any and all claims they have or may have against Rabie; and
- d) The releases granted herein do not and are not intended to release any individual or entity other than the Debtors and Rabie.

2. Exhibit A to the Plan, entitled “Retained Causes of Action and Defenses” shall be modified to **delete** the following paragraph 6:

The claims and causes of action the Debtors may assert against Dr. Mahmoud “Mike” Rabie for avoidance and recovery of \$684,490.20 in pre-petition payments, which the Debtors assert are avoidable and recoverable under sections 548 and 550 of the Bankruptcy Code, including the Debtors’ objections to proofs of claim filed by Dr. Mahmoud “Mike” Rabie.

Dated: December 7, 2022.

/s/ J. Robert Forshey
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon the parties on the attached service list via ECF Electronic Notice, where available, on December 7, 2022 and served via United States Mail, first class postage prepaid on December 7, 2022.

/s/ J. Robert Forshey
J. Robert Forshey